

December 12, 2011

Mr. Manucher Alemi
Chief, Water Use and Efficiency Branch
Department of Water Resources
901 P Street
Sacramento, California 95814

RE: Comments on the *Draft Report to the Legislature Quantifying the Efficiency of Agricultural Water Use*

Dear Manucher:

We appreciate this opportunity to provide comments on the *Draft Report to the Legislature Quantifying the Efficiency of Agricultural Water Use* (Draft Report). Our comments and recommended changes to the Draft Report are crafted with the goal of providing the Legislature with a report that contains the information it needs to make informed decisions regarding future legislation, as well as the impacts that legislation will have on the State budget, individual landowners, local government entities and third parties.

As has been mentioned in numerous meetings of the Agricultural Stakeholder Committee (ASC) and the A1 Subcommittee, this report is a rare opportunity to provide the Legislature with an overview of an applicable (or employable) “methodology for quantifying the efficiency of agricultural water use.” To achieve this, the report must be accurate, direct, concise and realistic.

In recognition of the goal mentioned above, we are submitting the attached edited Draft Report in addition to the following overarching comments:

- As written, it is difficult to understand what work could be conducted with current programs and practices and what would require additional resources and/or data collection and reporting. The Draft Report includes implementation deadlines that assume funding and data development will occur on an unrealistic schedule. The report would provide more value to the Legislature, Department of Water Resources (DWR) and regulated entities if it aligned implementation activities with either ongoing programs and funding or potential new funding as follows:
 - Activities that are currently being conducted or could be conducted through currently funded programs such as the California Water Plan (such as those at the Hydrologic Region Scale);
 - Activities requiring the acquisition of additional funding for DWR to develop, collect or calculate the data, and;
 - Activities that would require the development of new data by DWR and/or individual landowners, local agencies and other local government entities or third parties.

- An alternative to the phased approach mentioned above would be to limit the implementation section to those activities that would be conducted by DWR.
- The document would also provide greater value if it included a clear description of which entities would be providing data. Currently, readers of the report could be given the false impression that DWR is in possession of or could require the submission of data from all water users. For example, aggregated farm gate water delivery data is only required from suppliers serving more than 2,000 acres *if it is locally cost effective*. Suppliers larger than 25,000 acres will likely be supplying the data, because they are not subject to the locally cost effective stipulation. But, DWR could require suppliers over 10,000 acres to provide the measurement data if, and only if, DWR provides the funding for the districts to implement a measurement program (which would need to be factored into the implementation costs). Also, the report should clarify who will be required to submit Agricultural Water Management Plans, and whether regional water management plans (developed by multiple, cooperating suppliers) and Bureau of Reclamation approved plans provide the data necessary to implement water supplier scale quantification?
- According to Water Code Sec. 10608.64, DWR is required to “develop a methodology for quantifying the efficiency of agricultural water use” and report to the Legislature a “proposed methodology and a plan for implementation.” Productivity indicators simply **cannot** be used to quantify the efficiency of agricultural water use. Weight of crop production is influenced by many different variables and is just as likely to be impacted by the weather, changes in varieties of a crop grown, pest control, nutrients, etc. as it is by efficient water use. Value of crop production includes the variables mentioned above and adds one additional factor, highly volatile commodity pricing. While we see value in including the description of productivity indicators in the report as a means of educating the Legislature, the indicators must be placed in appropriate context and the limits of their utility must be adequately described. Specifically, we recommend that the productivity indicators be presented and discussed separately from the recommended physically-based methods to quantify the efficiency of agricultural water use. Because the “productivity indicators” cannot be used to quantify the efficiency of agricultural water use, they should not be included in the methodology section of the Report, nor should a plan and cost estimate for their implementation be included. They could be presented in a separate section of the report including discussion of their appropriate application and limitations.
- The Draft Report would benefit from a description of the framework for efficiency in the introduction section of the document. This framework would provide context to the subsequent discussion on efficiency and hopefully clarify the importance of regional hydrologic differences on the applicability and utility of the various different methods for quantifying efficiency. This framework would benefit by reference to pertinent existing documents including the Center for Irrigation Technology's *Agricultural Water Use in California: A 2011 Update* and the *Efficient Water Management for Regional Sustainability in the Sacramento Valley* report prepared for NCWA.

- The Draft Report needs to include the dissemination of information in both the implementation description of the report, as well as the cost estimate. The effort to establish a methodology will provide greater value if the information gathered and calculations made are readily available. Historically, data management activities associated with mandated reporting has been insufficient or non-existent. This has led to assumptions that monitoring or management is not occurring or that entities, including DWR, are withholding information. On-line data management technologies should be employed.
- The Draft Report refers to standardized procedures that either presently exist or will need to be developed to apply some of the recommended methodologies. While we agree that standardized methodologies should be the ultimate goal, we also believe that standardization is extremely challenging due to the widely different conditions throughout the State that influence agricultural water management. The Report should clearly acknowledge these differences and the challenges they pose, and fully account for the time and costs involved in developing methods that are standardized to the extent possible but also allow the customization needed to make them practical and meaningful.

Thank you for considering our proposed changes to the Draft Report. We would welcome the opportunity to discuss our proposed changes in greater detail. Once again, we hope that these recommendations will assist DWR in crafting a final Report that complies with the legislative mandate, and moreover provides value and guidance to the Legislature.

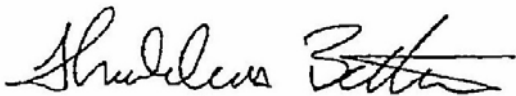
Sincerely,



Todd Manley
Northern California Water Association



Ted Trimble
Western Canal Water District



Thad Bettner
Glenn-Colusa Irrigation District



Tim O'Halloran
Yolo County Flood Control &
Water Conservation District



Brad Mattson
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